

# EXHIBIT A

STATE OF INDIANA	)	IN THE HAMILTON COUNTY COURT
	)	SS:
COUNTY OF HAMILTON	)	CAUSE NO.
	)	
BRIAN LENNON	)	
	)	
Plaintiff,	)	
	)	
v.	)	<u>JURY TRIAL REQUESTED</u>
	)	
HOME DEPOT U.S.A. INC.	)	
	)	
Defendant.	)	

### COMPLAINT FOR DAMAGES

COMES NOW, Plaintiff, Brian Lennon, and for his Complaint for Damages against the Defendant asserts and alleges:

1. Plaintiff, Brian Lennon, is a resident of the State of Indiana, and maintains his primary domicile at 4117 Kalmar Drive, Indianapolis, Indiana 46222.
2. Defendant, Home Depot U.S.A., Inc. is a corporation, incorporated in the State of Delaware, and maintains its primary business offices at 2455 Paces Ferry Road, Atlanta, Georgia, 30339;
3. Home Depot, U.S.A., Inc. owns, operates, or maintains a facility in the State of Indiana, located at 9855 North Michigan Road, Carmel, Indiana;
4. On or about August 19, 2019, Plaintiff, Brian Lennon, was on a jobsite owned or operated by the Defendant. Plaintiff was working on the jobsite when he fell on debris hanging from a pallet. The Plaintiff sustained injuries as are hereinafter alleged;

5. At said time and place, the Defendant, was careless and negligent in one or more of the following respects:
  - a. The Defendant, carelessly and negligently failed to maintain its jobsite in a safe and non-hazardous condition;
  - b. The Defendant, carelessly and negligently failed to provide any warning to Plaintiff of the hazardous condition; and
  - c. The Defendant failed to remove debris and obstructions from the aisles of its facility;
6. As a direct and proximate result of the carelessness and negligence of the Defendant, the Plaintiff, sustained injuries including, but not limited to, his face, wrist and shoulder and has engaged the services of physicians and hospitals to treat such injuries, and has thereby incurred medical expenses. Additional medical expenses will continue in the future as needed;
7. As a direct and proximate result of the carelessness and negligence of the Defendants, the Plaintiff, has lost wages;
8. Plaintiff's injuries may be permanent in nature;
9. The Plaintiff has been damaged as a direct and proximate result of the carelessness and negligence of the Defendant.

WHEREFORE, the Plaintiff, Brian Lennon, prays for a judgment in an amount commensurate with his injuries and damages, for the costs of this action, for a trial by jury, and for all other just and proper relief in the premises.

Respectfully Submitted,

/s/ Sarah E. Anderson  
Sarah E. Anderson, No. 28450-49

Attorney for Plaintiff

KARPE LITIGATION GROUP  
19 West 19<sup>th</sup> Street  
Indianapolis, IN 46241  
(317) 251-1840



Hamilton Superior Court 1

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 HOME DEPOT U.S.A. INC. )  
 )  
 Defendant. )

TO DEFENDANT:

Home Depot, U.S.A. INC.  
 Corporation Service Company, Registered Agent  
 135 N. Pennsylvania Street  
 Suite 1610  
 Indianapolis, IN 46204

You are hereby notified that you have been sued by the person named as Plaintiffs and in the Court indicated above.

The nature of the suit against you is stated in the Complaint which is attached to this Summons. It also states the relief sought or the demand made against you by the Plaintiffs.

An answer or other appropriate response in writing to the Complaint must be filed either by you or your attorney with twenty (20) days, commencing the day after you receive this Summons, (or 23 days if this Summons was received by mail), or a judgment by default may be rendered against you for the relief demanded by Plaintiffs.

If you have a claim for relief against the Plaintiffs arising from the same transaction or occurrence, you must assert it in your written answer.

If you need the name of an attorney, you may contact the Indianapolis Bar Association Lawyer Referral Service (269-2222) or the Marion County Bar Association Lawyer Referral Service (634-3950).

Dated: 4/6/2020

*Kathy Keag Williams*  
 Clerk, Hamilton County Court

(The following manner of service of summons is hereby designated)

x ☒ Registered or certified mail.  
☐ Service at place of employment, to-wit: \_\_\_\_\_  
☐ Service on individual - (Personal or copy) at above address, followed by copy of  
 summons to U.S. Mail.  
☐ Service on agent. (Specify) \_\_\_\_\_  
☐ Other service. (Specify) \_\_\_\_\_

/s/ Sarah E. Anderson**Sarah E. Anderson, Attorney for Plaintiff**

Attorney Sarah E. Anderson  
 19 West 19<sup>th</sup> Street  
 Indianapolis, Indiana 46202  
 (317) 251-1840

